



**Re: Harbor pathogen TMDL**  
**Barbara Hirst** to: Rosella OConnor  
Cc: Felix Locicero

01/13/2012 09:25 AM

We are discussing internally a possible alternative approach. Will keep you posted. I would comment, however, that I believe HydroQual owes you a run that actually sets the tmdl; using incorrect boundary assumptions should warrant a free run.

>>> Rosella OConnor <OConnor.Rosella@epamail.epa.gov>  
1/11/2012 4:56 PM >>>  
Barbara,

As I understand the Harbor Pathogens TMDL agreements, EPA had agreed to provide funds for preparing the TMDL document and providing technical support for public notice. These funds are available to support NJDEP. What was not anticipated was needing additional model runs to address boundary conditions. The current contract does not support this. However, after speaking to management and exploring several alternatives, we will be able to shift funds to the pathogen contract to address NJ's concerns and conduct another run. Therefore, the good news is that the money issue is resolved.

We will need to get the boundary condition information sorted out as soon as possible. Can Stevens provide the information prior to completing all the modeling? What is your sense of how soon we can provide the info to HydroQual?

Thanks,  
Rosella

From: "Barbara Hirst"  
<Barbara.Hirst@dep.state.nj.us>  
To: Rosella OConnor/R2/USEPA/US@EPA  
Date: 01/10/2012 04:04 PM  
Subject: Harbor pathogen TMDL

Rosella,

Re: Pathogen TMDL for NY/NJ Harbor

Based on our recent discussions, the schedule appears to be lagging and

EPA is facing a budget problem. In addition to the delay experienced in resolving the issue of "what it would take" to achieve the entero geomean in all cells in the Hackensack (not the 40% previously presented in project reports), we have recently learned that "meeting standards" at the boundaries meant a model input assumption of never exceeding the 35 entero level, which is decidedly more stringent than the intended standard expressed as a geomean, thus not the same as "meeting standards". To address this issue, we are continuing to work with Stevens to be able to provide appropriate input assumptions based on the modeling of the Passaic River above Dundee Dam. The Stevens work is expected to take at least another month.

As to the budget, we are very concerned by the information you shared yesterday that there is not enough money to 1) correct the model runs, 2) provide the agreed upon tmdl documentation and 3) provide assistance with responding to technical comments received after the tmdl is proposed. We will need to discuss how all these needs can be accommodated in order to be able to move forward with Harbor pathogen tmdls.